

**THE STATE OF NEW HAMPSHIRE
JUDICIAL BRANCH
SUPERIOR COURT**

Cheshire Superior Court
33 Winter Street, Suite 2
Keene NH 03431

Telephone: 1-855-212-1234
TTY/TDD Relay: (800) 735-2964
<http://www.courts.state.nh.us>

SUMMONS IN A CIVIL ACTION

Case Name: **Edwin Hunt, et al v Target Corporation**
Case Number: **213-2018-CV-00023**

Date Complaint Filed: February 15, 2018

A Complaint has been filed against Target Corporation in this Court. A copy of the Complaint is attached.

The Court ORDERS that ON OR BEFORE:

April 01, 2018	Edwin Hunt; Louise Hunt shall have this Summons and the attached Complaint served upon Target Corporation by in hand or by leaving a copy at his/her abode, or by such other service as is allowed by law.
April 22, 2018	Edwin Hunt; Louise Hunt shall file the return(s) of service with this Court. Failure to do so may result in this action being dismissed without further notice.
30 days after Defendant is served	Target Corporation must file an Appearance and Answer or other responsive pleading form with this Court. A copy of the Appearance and Answer or other responsive pleading must be sent to the party listed below and any other party who has filed an Appearance in this matter.

Notice to Target Corporation: If you do not comply with these requirements you will be considered in default and the Court may issue orders that affect you without your input.

Send copies to:

Ronald E. Cook, ESQ

Ransmeier & Spellman PC
31 Mooney St
PO Box 817
Alton NH 03809-0817

BY ORDER OF THE COURT

February 15, 2018

Catherine J. Ruffle
Clerk of Court

(555)

THE STATE OF NEW HAMPSHIRE

Cheshire, SS.

SUPERIOR COURT

Edwin and Louise Hunt

v.

Target Corporation

COMPLAINT

The Plaintiffs, Edwin and Louise Hunt, through their attorneys, Ransmeier & Spellman, Professional Corporation, hereby complain against Target Corporation, and state as follows:

Parties

1. Plaintiff Edwin Hunt is a natural person having an address at 37 Munsell Street, Hoosick Falls, NY 02090.
2. Plaintiff Louise Hunt is a natural person having an address at 37 Munsell Street, Hoosick Falls, NY 02090.
3. Defendant Target Stores (Target) is a Corporation with a principal place of business at 1000 Nicollet Mall, Minneapolis, MN 55403

Jurisdiction and Venue

4. Jurisdiction of this case is proper in Cheshire County Superior Court because the incident occurred in this County.

Facts

5. On February 22, 2015 Mr. Hunt was making a delivery to the Target store in Keene, New Hampshire. He was walking around his work truck to drop and hook a Target trailer of merchandise when he slipped and fell on ice that had accumulated in the docking area resulting in severe injuries to his back, right hip and knee.

6. Target, as owner of the premises, was responsible for maintaining and operating its merchandise delivery docking area where the incident occurred in a reasonably safe condition or manner which included keeping all areas free of ice and snow.

Count I – Negligence

7. Target was responsible for maintaining the docking area where the incident occurred in a reasonably safe condition or manner which included keeping all areas free of ice and snow.

8. Target breached its duty to Mr. Hunt by carelessly and negligently failing to maintain the premises by allowing snow and ice to build up in the docking area.

9. Target should have foreseen that the docking area would be dangerous if accumulated snow and ice was not removed.

10. Target failed to take preventative action, remedy or give warning of the extremely hazardous condition of which it knew or in the exercise of reasonable care should have known would be created by allowing snow and ice to accumulate in the area where the fall occurred.

11. As a direct result of Target's failure to properly inspect and maintain the docking area where the plaintiff fell and to remove the accumulated snow and ice, the plaintiff suffered severe injuries, expenses for medical treatment, lost earnings and continued discomfort and limitations to his daily activities.

Count II Loss of Consortium

12. Louise Hunt is the spouse of Edwin Hunt and as such, his injuries have had, and will continue to have, an adverse effect on her. Under RSA 507:8-A, she is entitled to recover damages for her loss of consortium.

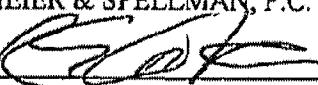
WHEREFORE Plaintiffs Pray:

- A. A jury trial on all counts;
- B. An award of money damages; and
- C. Such other relief as is just and proper

Respectfully submitted,

Edwin and Louise Hunt

Through their attorneys,
RANSMEIER & SPELLMAN, P.C.

Dated: *2/14/18*
By: 
Ronald E. Cook, Esquire (Bar No. 158)
One Capitol St.
P.O. Box 600
Concord, NH 03302-0600
(603) 228-0477

4851-6182-3580, v. 1

Merrimack County Sheriff's Office

SHERIFF SCOTT E. HILLIARD
333 Daniel Webster Hwy
Boscawen, NH 03303
Phone: 603-796-6600

TARGET CORPORATION
9 CAPITOL ST
CONCORD, NH 03301

AFFIDAVIT OF SERVICE

MERRIMACK, SS

3/16/18

I, DEPUTY STACIE FISKE, on this day at 11:35 (a.m.) p.m., summoned the within named defendant TARGET CORPORATION by leaving at the office of Registered Agent CT Corporation, 9 Capitol Street, Concord, said County and State of New Hampshire, its true and lawful agent for the service of process under and by virtue of Chapter 293-A, NH RSA as amended, a true and attested copy of this Summons and Complaint.

FEES

Service	\$25.00
Postage	1.00
Travel	15.00
TOTAL	\$41.00

Stacie Fiske
DEPUTY STACIE FISKE
Merrimack County Sheriff's Office

A TRUE COPY ATTEST:

Stacie Fiske

STACIE FISKE, DEPUTY
Merrimack County Sheriff's Office